

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In Re: Generations on 1 st , LLC, Debtor.	Case No.: 25-30002 Chapter 11
In Re: Parkside Place LLC, Debtor.	Case No.: 25-30003 Chapter 11

RULE 45(d)(2)(B) OBJECTION TO SUBPOENAS

Pursuant to Federal Rule of Civil Procedure 45(d)(2)(B), (1) Craig Holdings, LLC; (2) Craig Properties, LLC; (3) Craig Development, LLC; (4) CP Business Management, Inc.; (5) Mulinda a/k/a Mindy Craig, and (6) Jesse Craig (hereinafter referred to collectively as the “Craig Entities”), hereby object to the subpoenas duces tecum served by Caren W. Stanley, Vogel Law Firm, in the above-captioned bankruptcy cases pending in the United States Bankruptcy Court for the District of North Dakota.

Preliminary Objections of the Craig Entities to Rule 2004 Subpoenas

The Craig Entities, as non-debtor third parties, hereby note the following objections to the subpoenas issued under Rule 2004 of the Federal Rules of Bankruptcy Procedure. These objections are asserted without waiver and expressly preserve all rights, including the right to move to quash or seek protective relief:

- **Non-Party Status:** The Craig Entities are not debtors in this case and have no legal obligation to respond to subpoenas absent a court order. No such order has been obtained, and no legal basis has been established to compel compliance.
- **Overbreadth and Undue Burden:** The subpoenas are overbroad on their face and impose an undue burden on non-parties by seeking expansive categories of documents with no reasonable limitations.
- **Lack of Relevance:** The requests seek information unrelated to the administration of the estate or any legitimate issue in the bankruptcy proceedings.
- **Improper Use of Rule 2004:** The subpoenas are an impermissible fishing expedition. No showing has been made that the Craig Entities possess information essential to the debtor's estate.
- **Privilege and Confidentiality:** The subpoenas seek documents that are protected by the attorney-client privilege, work-product doctrine, and/or confidentiality obligations. No protective measures are proposed.
- **Corporate Separateness Ignored:** No motion for veil piercing, substantive consolidation, or fraudulent transfer has been filed. There is no authority to disregard the distinct legal existence of the Craig Entities.
- **Reservation of Rights:** The Craig Entities reserve all rights to supplement these objections, move to quash the subpoenas, and seek all available remedies, including protective orders and cost-shifting.

The Craig Entities reserve all rights to seek relief from the Court, including filing a motion to quash or for protective order. Further, the Craig Entities reserve all rights relating to claiming costs for production of any documents that are produced.

Dated: July 10, 2025

By: /s/ Daniel J. Frisk
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Management, Inc.; Mulinda a/k/a Mindy
Craig and Jesse Craig*

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

By: /s/ Daniel J. Frisk
Daniel J. Frisk (ND ID#05109)
Mark A. Schwab (SD ID#5422)
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